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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,)	Case No. 3:20-CR-00294-IM
)	
Plaintiff,)	
)	
vs.)	DEFENDANT'S FIFTH UNOPPOSED
)	MOTION TO CONTINUE/RESET TRIAL
JOSEPH JAMES YBARRA,)	DATE AND WAIVER OF SPEEDY
)	TRIAL
Defendant.)	
)	

COMES NOW Defendant, Joseph James Ybarra, by and through his attorney, Andrew M. Kohlmetz, and hereby moves this Court for an Order continuing the presently set trial date of October 26, 2021, for a period of approximately 30 days to a date convenient to the Court and parties on or after November 29, 2021.

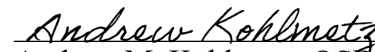
I have discussed the proposed continuance with the defendant who is in custody. He consents to the proposed continuance and agrees that the period of time between the current and next scheduled trial date will be excluded from any Speedy Trial Act calculations.

I have conferred with AUSA Parakram Singh regarding this continuance request. He has no objection to this Motion.

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The grounds for this request are more fully outlined in the accompanying Declaration of Counsel.

RESPECTFULLY SUBMITTED this 12th day of October, 2021.



Andrew M. Kohlmetz, OSB 955418
Attorney for Defendant Ybarra